Some brief comments on the Broadband over Power Line (BPL) issue:

- 1. As noted elsewhere, BPL would require the power systems to bypass the noise isolating effects of transformers, increasing noise levels from other sources at all frequencies.
- 2. Many amateur radio operators have taken an interest in lower power, or "QRP", operation in recent years. There are many reasons for this, but one is that such operation minimizes the impact of the amateur's operation on nearby electronic equipment. If BPL were widely implemented, the likely increase in noise floors would make such operation more difficult or impossible, forcing the amateurs to revert to higher power operation, with resultant increases in interference to many other nearby electronic devices.
- 3. Keeping the BPL signals in the desired bands would be difficult. To recall a recent situation in the Cincinnati area, the interaction of an AM broadcast station and poorly maintained power transmission lines caused major interference on frequencies nowhere near the AM station's frequency. Similar mixing products of BPL in the real world of a poorly maintained power system is a major concern.
- 4. The wideband, noiselike nature of BPL will be very difficult to track and evaluate. Perhaps the Commission could require BPL systems to include periodic identification on a discrete RF frequency (i.e. International Morse code). This would permit those in the field to trace the propagation of BPL signals.
- 5. Over the years the amateur service has attempted to expand, or merely protect, its HF frequency allocations. Such attempts have been opposed by other users, domestic or otherwise. So out there somebody, somewhere, is using the frequencies proposed for BPL. Will raising the noise floor on those presently non-amateur frequencies drive these users onto frequencies amateurs use?